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Attorney for Plaintiff

**UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF THE NORTHERN MARIANA ISLANDS**

SAIPAN HANDICRAFT,

Plaintiff,

vs.

MICRONESIA WOODCRAFT ENT., INC.,  
et al.,

Defendants.

Civil Action No. 05-0040

**DECLARATION OF PLAINTIFF'S  
COUNSEL IN SUPPORT OF  
APPLICATION FOR ENTRY OF  
DEFAULT JUDGMENT AGAINST  
FRANCISCO S. PANGELINAN**

I, F. Matthew Smith, hereby depose and say:

1. I am a duly licensed attorney and I am admitted to practice before all courts of the CNMI;
2. I am counsel for Plaintiff Saipan Handicraft in this matter;
3. That on April 18, 2006, I caused to be filed Plaintiff's First Amended Verified Complaint naming Defendant Francisco S. Pangelinan as a party in this matter;
4. That on April 21, 2006, at my direction, a Summons and a copy of Plaintiff's First Amended Complaint was served on Defendant Francisco S. Pangelinan by personally delivering the documents to Defendant;
5. That on April 26, 2006, at my direction, a Proof of Service on Defendant Francisco S. Pangelinan was filed with the Court;
6. That from the date of service of the Summons and a copy of Plaintiff's First

**EXHIBIT**

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Amended Verified Complaint to present, Defendant Francisco S. Pangelinan has failed to file a responsive pleading or otherwise defend the suit;

7. That more than twenty (20) days have elapsed since Defendant was served with the Summons and a copy of Plaintiff's First Amended Verified Complaint; and

8. That to my knowledge the Clerk of Court has not received any Answer, responsive pleading or other communication from Defendant in this matter.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true, correct, and to the best of my knowledge.

Affiant sayeth naught.

Executed this 7 day of July, 2006, Saipan, the Commonwealth of the Northern Mariana Islands.

  
E. MATTHEW SMITH  
Attorney for Plaintiff Saipan Handicraft